

Department of the Treasury
Chief, Regulations and Procedures Division,
Alcohol and Tobacco Tax and Trade Bureau,
Attention Notice No. 34
PO Box 14412
Washington DC 200044-4412

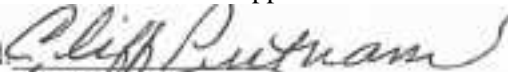
Comment 7

June 5, 2005

Comments to Petition to Establish Fort Ross-Seaview Viticultural Area (2003R-191T)

I CLIFF Putnam, make the following comment to the Petition to Establish a Fort Ross-Seaview Viticultural Area:

- 1.) I own a vineyard north of the proposed Viticultural area off of Annapolis Road. My Vineyard is elevated above most fog intrusion. Temperature records from the vineyard adjacent to mine classify the area of our vineyards as high Region I.
- 2.) The proposed Fort Ross-Seaview Viticultural Area excludes my vineyard and other vineyards on the Sonoma Coastal ridges that are located to the north of the proposed AVA.
- 3.) No persuasive evidence is presented to justify exclusion of the vineyards north of the proposed area:
 - There is no information presented that shows that the northern vineyards do not have "Coastal Cool" or equivalent degree summation days to vineyards within the proposed area.
 - There is no information presented that shows that the northern vineyards' soils are not varied, well drained and lacking alluvium.
 - There is no information presented that shows that the mountain vineyards to the north are located so low in elevation that they are nearly always covered in fog such that they are no longer "Coastal Cool" sites.
- 6.) Soils that are described as present in the proposed AVA are present in my vineyard as well. Vineyards north of the proposed area have Hugo series and Goldridge soils that are well drained and lack alluvium.
- 5.) My Vineyard is situated sufficiently above marine fog intrusion to ripen grapes and I consider it a "Coastal Cool" site.
- 7.) The 900 foot elevation in the Sonoma Coast Mountains is not necessarily an elevation separating Marine Cold climates, in which there is too little solar radiation to ripen grapes, from a Coastal Cool climate that supports viticulture.

Signed: 
Dated: 6-5-05